

each of said audio/video appliances having an optical coupler with filters for separating said first and second data channels.”

The Office Action acknowledges that Broghammer does not explicitly disclose the above quoted limitations. In an effort to cure this deficiency, the Office Action introduces Takatsu. However, Applicant respectfully submits that Takatsu fails to cure the deficiency noted in Broghammer.

Takatsu discloses an optical network including optical fibers with data transmitted between transmission devices in a first channel having a first optical wavelength and data transmitted between other transmission devices in a second data channel having a second optical wavelength. See Takatsu Figures 1a, 1b, column 5, lines 8-28, column 7, lines 9-33. Applicant notes that Takatsu does not disclose that each of the audio/video appliances has an optical coupler with filters for separating the first and second data channels. Neither does Takatsu disclose that each of the transmission devices has such an optical coupler.

As disclosed in Takatsu, the optical signals “having wavelengths $\lambda_1 - \lambda_n$, input from the existing single wavelength light transmitting devices W_1-W_n and E_1-E_n to multiplexing/demultiplexing devices...having the respective wavelengths (channels).” Individual signals of the transmission devices are multiplexed for transmission over a single optical fiber. In Takatsu, no single transmission device uses two or more wavelengths for transmission. Thus, the transmission devices do not comprise an optical coupler for separating channels according to the different wavelengths.

In Takatsu, channel separation according to the different wavelengths is performed by multiplexing and demultiplexing devices (WMUX A and WMUX B). However, it should be noted that these devices are not part of the transmission devices and these multiplexing and

demultiplexing devices are used for multiple transmission devices. Because these multiplexing/demultiplexing devices are connected to the transmission devices, there is no need for the transmission devices to have their own optical coupler with filters for separating different wavelengths. In particular, there is no need for each of the transmission devices to have its own optical coupler with filters for separating different wavelengths as recited in the claims.

Takatsu discloses that each different transmission device, for example W1 and E1 communicate with like transmission devices, Wn and En respectively, using only a single wavelength for their communication. (See Figure 1a, 1b and column 7, lines 9-33). That is, each transmission device W1, E1 on one end uses a different wavelength for transmission. Thus, it is not possible for different transmission devices to communicate with each other because each different transmission device uses different wavelengths. For example, device W1 in Takatsu can communicate only with device Wn, and not with En, because the E devices use a different wavelength than the W devices. For at least this reason, the combination of Broghammer and Takatsu fail to disclose the system set forth in claim 7 wherein audio/video appliances of the network can use the same two wavelengths for communication.

Moreover, the WDM optical couplers of Takatsu are not part of the transmission devices as discussed above but part of the data transmission infrastructure as shown in Figures 19, 20, and discussed at column 20, lines 27-59. The disclosed supervisory control signal SV which is filters not used for communication between transmission devices but communication between infrastructure components such as the wavelength multiplexing optical amplifiers used in the wavelength division multiplexing transmission system. Thus, for this additional reason, Applicant notes that Takatsu fails to disclose that each transmission device has an optical coupler with filters for separating channels.

Finally, Applicant notes that there is no motivation to combine these references and any combination thereof amounts to hindsight reconstruction that fails to arrive at the present invention. As discussed above, the cited combination fails to disclose the explicitly recited claim limitations. Further, Applicant notes that there is no motivation or reason for combining Broghammer and Takatsu. Absent such a showing, a *prima facie* case obviousness cannot be made. The Office Action asserts that one would combine Broghammer and Takatsu because “to introduce channels with different wavelengths into the system of Broghammer has taught by Takatsu, for the benefit of limiting noise and interference in the system.” See Office Action at 3. However, Applicant submits that this is not an appropriate reasoning for combining these references.

The MOST system disclosed in Broghammer provides an optical solution for automotive media networks with low overhead and low cost in a point-to-point network implemented in a ring over optical fibers. The physical layer (electrical and optical parameters) as well as the application layer, network layer, and medium access control are defined by the MOST bus specification. Thus, one would not be motivated to modify a MOST bus system by adding multiple channels having different wavelengths as recited in the claims. Thus, for this final reason, Applicant notes that claim 7 is allowable over the cited combination.

Claim 8 recites that the data transmitted in said first data channels are formatted according to a first data format and data transmitted in said second data channel are formatted according to a second data format. Applicant notes that the data formats are data protocols as discussed in the specification.

The Office Action cites to the disclosure in Broghammer discussing that the graphic output used to process the various graphic data formats from different graphic data sources. However, there is no disclosure that the data in Broghammer is transmitted over different data channels or that any

given channel uses a specific data format or protocol. Thus, because Broghammer fails to disclose different transmission protocols, Applicant respectfully submits that claim 8 is allowable over cited combination.

Claims 8, 9 and 11 depend from claim 7. These claims add additional limitations which, in addition to the limitations set forth in claim 7, are also directed toward patentable subject matter. Thus, claims 8, 9 and 11 should also be allowed.

Claim 10 stands rejected under 35 USC §103(a) as being unpatentable over Broghammer in view of Takatsu and further in view of U.S. Patent No. 6,052,555 ("Ferguson"). Applicant respectfully requests reconsideration and withdrawal of this rejection.

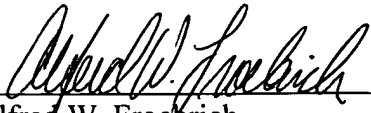
As discussed above, claim 7 is allowable over the cited combination. Ferguson was not added to cure the noted deficiency in Takatsu but for its alleged disclosure of other limitations. However, Ferguson does not disclose that the data is transmitted over the interconnections using two or more channels and Ferguson also does not disclose channels or interconnections with different bandwidths and that the channel having a larger bandwidth is used to transmit data based on an internet protocol. Thus, the cited combination fails to render claim 10 obvious. Thus, claim 10 is in condition for immediate allowance.

Applicant has responded to all of the rejections and objections recited in the Office Action. Reconsideration and a Notice of Allowance for all of the pending claims are therefore respectfully requested.

If the Examiner believes an interview would be of assistance, the Examiner is encouraged to contact the undersigned at the number listed below.

It is believed that no fees or charges are required at this time in connection with the present application. However, if any fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

Respectfully submitted,
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